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8 Attorneys for Trustee,
9 CAROL W. WU

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 In re:

Case No. 07-53563 ASW

13 INTEGRATED PACKAGING ASSEMBLY
14 CORP.
15 DbA IPAC
16 Tax ID # 47-0929011

Chapter 7

17 Debtor

18 **APPLICATION TO EMPLOY COUNSEL BY TRUSTEE**

19 TO THE HONORABLE ARTHUR S. WEISSBRODT, UNITED STATES BANKRUPTCY
20 JUDGE:

21 Carol Wu ("Trustee"), trustee of the above referenced bankruptcy estate, respectfully
22 requests an order authorizing the employment of counsel and, in support thereof, represents as
23 follows:

24 1. An Order for relief under Chapter 11 of Title 11 of the United States Code was
25 entered herein pursuant to a voluntary petition filed by the Debtor on October 31, 2007. The case
26 was converted to Chapter 7 on September 18, 2008, and Carol W. Wu is the duly appointed,
27 qualified and acting trustee of the Debtor's estate.

28 2. The Trustee requires the legal services of counsel to assist her in the administration
of this case with respect to the following matters:

(a) To investigate alleged pre-petition sale of Debtor's business, and if

warranted, file legal action in connection therewith;

(b) To investigate, and if warranted, file actions to recover voidable transfers;

(c) To determine extent and validity of liens;

(d) To investigate extent and use of Debtor's licenses by third parties;

(e) To perform such other services as may reasonably be required during the progression of the case.

3. The Trustee has conferred with and desires to retain and employ Stromsheim and Associates as her attorneys to perform the above described services which may be necessary and desirable in the administration of the Debtor's estate. The law firm is employed on an hourly basis with reasonable compensation to be paid as allowed by the Court after notice and hearing. The current hourly rates are set forth on the attached Exhibit "A", and the law firm is to be reimbursed for expenses it incurs in representing the Trustee. The firm's billing rates are subject to change from time to time as circumstances warrant.

4. The firm has agreed that for the potential avoidance claims pursued under Bankruptcy Code § 544 through 551, whether or not a lawsuit is filed, the firm is willing to accept employment on a contingency fee basis. The terms of the contingency agreement are as follows:

The fee for the pursuit of the avoidance action shall be 1/3 of the recovery, plus reimbursement of all actual and necessary costs incurred in the investigation of, and pursuit of the claim; however, in the event that a lawsuit is filed and settled within eight days of the trial date, the contingency shall be 40% of the recovery, and in the event that the lawsuit results in a judgment, the contingency shall be 45% of the recovery.

No investigation has been undertaken by the attorneys at this point, no contact has been made by the attorneys with any transferees or the Debtors; there are no funds in the estate; the Trustee has made no demand for a turnover of funds, and the only information about the potentially voidable transfers is what has been provided to counsel by the Trustee.

The attorneys have agreed to be employed on a contingency basis in all cases of this Trustee where there are the type of possible claims as indicated above. The attorneys will not

1 selectively chose one case for contingency fees, and another on an hourly basis, and the attorneys
2 will keep contemporaneous time records for all types of services, including those that are
3 contingency fee based.

4 Any other legal services that will be necessary in the case shall be compensated on an
5 hourly basis.

6 5. The Trustee has selected the law firm because of the extensive experience and
7 knowledge of its members in the field of bankruptcy, insolvency and debtor's and creditor rights
8 and believes that the law firm is well qualified to represent her in the case.

9 6. To the best of the Trustee's knowledge, the members and associates of Stromsheim
10 & Associates do not have any connection with the Trustee, the Debtor, its creditors, any other
11 party in interest, their respective attorneys and accountants, the United States Trustee, or any
12 person employed in the office of the United States Trustee, and represent no interest adverse to the
13 estate in matters upon which it is to be retained.

14 WHEREFORE, the Trustee requests the entry of an order authorizing her to employ
15 Stromsheim & Associates at the expense of the estate, to represent her in this Chapter 7 case.

16 DATED: This 25th day of September, 2008.

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18 By /s/ Carol W. Wu
19 TRUSTEE in INTEGRATED PACKAGING
20 ASSEMBLY CORP
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CURRENT BILLING RATES

Attorney	Rate
Reidun Stromsheim	\$495
Joanne M. LaFreniere	\$375
Kristina E. Pollak	\$220
Of Counsel	
Linda Sorensen	\$470